

IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF OHIO

BRIAN KEITH ALFORD A196-744

ENTER ABOVE THE NAME OF THE PLAINTIFF IN THIS ACTION)

IS THE PLAINTIFF A PRISONER: PRISONER # A196-744

vs.

ANNETTE CHAMBERS-SMITH, DR. ANDREW EDDY,

ENTER ABOVE THE NAME OF THE DEFENDANT IN THIS ACTION)

IF THERE ARE ADDITIONAL DEFENDANTS PLEASE LIST THEM:

WILLIAM COOL, PATRICIA HORNER, GARY WYNN PERTERSON,

T. NEFF, T. DIEHL, R. HUFF, LORI PETERMAN,

COMPLAINT

PARTIES TO THE ACTION:

PLAINTIFF: PLACE YOUR NAME AND ADDRESS ON THE LINES BELOW. THE ADDRESS YOU GIVE MUST BE THE ADDRESS THAT THE COURT MAY CONTACT YOU AND MAIL DOCUMENTS TO YOU. A TELEPHONE NUMBER IS REQUIRED.

BRIAN KEITH ALFORD A196-744

NAME - FULL NAME PLEASE - PRINT

ROSS CORRECTIONAL INSTITUTION

ADDRESS: STREET, CITY, STATE AND ZIP CODE

P.O. Box 7010 Chillicothe, Ohio 45601

TELEPHONE NUMBER

IF THERE ARE ADDITIONAL PLAINTIFFS IN THIS SUIT, A SEPARATE PIECE OF PAPER SHOULD BE ATTACHED IMMEDIATELY BEHIND THIS PAGE WITH THEIR FULL NAMES, ADDRESSES AND TELEPHONE NUMBERS. IF NO ADDITIONAL PLAINTIFFS EXIST CONTINUE WITH THIS FORM.

PAGE 2 AND 3 OF THIS FORM DEAL ONLY WITH A PLAINTIFF THAT IS INCARCERATED AT THE TIME OF FILING THIS COMPLAINT.

FILED  
TIME

NOV 20 2024  
RICHARD W. NAGEL, Clerk of Court  
COLUMBUS, OHIO

2:24 CV 4184

JUDGE SARGUS 1

MAGISTRATE JUDGE SILVAIN

PREVIOUS LAWSUITS:

- A. HAVE YOU BEGUN OTHER LAWSUITS IN STATE OR FEDERAL COURT DEALING WITH THE SAME FACTS INVOLVED IN THIS ACTION OR OTHERWISE RELATING TO YOUR IMPRISONMENT? YES ~~(X)~~ NO ( )
- B. IF YOUR ANSWER TO A IS YES, DESCRIBE THE LAWSUIT IN THE SPACE BELOW. (IF THERE IS MORE THAN ONE LAWSUIT, DESCRIBE THE ADDITIONAL LAWSUITS ON ANOTHER PIECE OF PAPER, USING THE SAME OUTLINE.)

1. PARTIES TO THIS PREVIOUS LAWSUIT

PLAINTIFFS:

BRIAN KETH ALFORD

DEFENDANTS:

LORI PETERMAN, BRIAN WITRUPP, JUSTICE, NOBLE, PARRISH,  
SALYERS, WESTFALL, CRISSLER, BAKER, BLACKWELL, KILLIAN,  
WEBB

2. COURT (IF FEDERAL COURT, NAME THE DISTRICT: IF STATE COURT, NAME THE COUNTY)

U.S. DISTRICT COURT/SOUTHERN DISTRICT/EASTERN DIVISION

3. DOCKET NUMBER

2:19-CV-1497

4. NAME OF THE JUDGE TO WHOM THE CASE WAS ASSIGNED

EDMOND A. SARGUS JR.

5. DISPOSITION (FOR EXAMPLE, WAS THE CASE DISMISSED? WAS IT APPEALED? IS IT STILL PENDING?)

DISMISSED WITHOUT PREJUDICE

6. APPROXIMATE DATE OF THE FILING OF THE LAWSUIT

July 10th, 2019

7. APPROXIMATE DATE OF THE DISPOSITION

July 10th, 2019

A. IS THERE A PRISONER GRIEVANCE PROCEDURE IN THIS INSTITUTION?  
YES ~~XX~~ NO ( )

B. DID YOU PRESENT THE FACTS RELATING TO YOUR COMPLAINT IN THIS STATE  
PRISONER GRIEVANCE PROCEDURE? YES ~~XX~~ NO ( )

C. IF YOUR ANSWER IS YES:

1. WHAT STEPS DID YOU TAKE?

ICR, GRIEVANCE, APPEAL FO GRIEVANCE, STG SERVICES,

DIRECTOR, CIIC

2. WHAT WAS THE RESULT?

IGNORED MY COMPLAINTS

D. IF YOUR ANSWER IS NO, EXPLAIN WHY NOT.

E. IF THERE IS NO PRISON GRIEVANCE PROCEDURE IN THIS INSTITUTION, DID  
YOU COMPLAIN TO PRISON AUTHORITIES? YES ( ) NO ( )

F. IF YOUR ANSWER IS YES:

1. WHAT STEPS DID YOU TAKE?

2. WHAT WAS THE RESULT?



DEFENDANT  
PLACE THE NAME AND ADDRESS OF EACH DEFENDANT YOU LISTED IN THE CAPTION ON THE FIRST PAGE OF THIS COMPLAINT. THIS FORM IS INVALID UNLESS EACH DEFENDANT APPEARS WITH FULL ADDRESS FOR PROPER SERVICE.

1. ANNETTE CHAMBERS SMITH  
NAMES - FULL NAME PLEASE  
4545 Fisher Road Suite D., Columbus, Ohio 43228  
ADDRESS - STREET, CITY, STATE AND ZIP CODE
2. DR. ANDREW EDDY  
4545 Fisher Road Suite D., Columbus, Ohio 43228
3. WILLIAM COOL  
4545 Fisher Road Suite D., Columbus, Ohio 43228
4. PATRICIA HORNER  
P.O. Box 5730 Toledo, Ohio 43613
5. GARY WYNN PETERMAN  
65 SOUTH FRONT STREET 3rd FLOOR - COLUMBUS, OHIO 43215
6. T. NEFF  
4545 Fisher Road Suite D., Columbus, Ohio 43228

IF THERE ARE ADDITIONAL DEFENDANTS, PLEASE CONTINUE LISTING THEM.

R. HUFF 4545 Fisher Road Suite D., Columbus, Ohio 43228

LORI PETERMAN 4545 Fisher Road Suite D., Columbus, Ohio 43228

T. DIEHL 43545 Fisher Road Suite D Columbus, Ohio 43228

PLEASE WRITE AS BRIEFLY AS POSSIBLE THE FACTS OF YOUR CASE. DESCRIBE HOW EACH DEFENDANT IS INVOLVED. INCLUDE THE NAME OF ALL PERSONS INVOLVED. GIVE DATES AND PLACES.

DO NOT GIVE ANY LEGAL ARGUMENTS OR CITE ANY CASES OR STATUTES.

IF YOU HAVE A NUMBER OF DIFFERENT CLAIMS; PLEASE NUMBER AND SET FORTH EACH CLAIM IN A SEPARATE PARAGRAPH. USE AS MUCH SPACE AS YOU NEED. YOU ARE NOT LIMITED TO THE PAPERS WE GIVE YOU. ATTACH EXTRA SHEETS THAT DEAL WITH YOUR STATEMENT CLAIM IMMEDIATELY BEHIND THIS PIECE OF PAPER.

(1) ANNETTE CHAMBERS-SMITH FAILED TO ACT AFTER BEING PLACED ON NOTICE OF THE VIOLATIONS NAMED HEREIN

(2) DR. ANDREW EDDY FAILED TO TREAT PLAINTIFF FOR A LIFE-THREATENING ILLNESS (HEP-C) IN VIOLATION OF THE EIGHTH AND FOUTEENTH AMENDMENTS

(3) WILLIAM COOL FAILED TO ACT AND TO PROTECT PLAINTIFF FROM THE CONSTITUTIONAL VIOLATIONS COMMITTED BY HIS STAFF (DUE PROCESS/COMPULSORY)

(4) R. HUFF COMMITTED LIBEL/SLANDER WHEN ALLEGING PLAINTIFF COMMITTED AN ACT OF MORAL TURPITUDE, WHICH REMOVED HIM FROM SINCLAIR COLLEGE DENYING HIM CONTINUANCE OF HIS EDUCATION FOR one year. , CAUSING DAMAGE TO PLAINTIFF'S REPUTATION.

(5) T. NEFF ALLOWED PLAINTIFF TO SIT IN RESTRICTIVE HOUSING FOR AN INVALIDATED INCIDENT REPORT ALLEGING PLAINTIFF ASSAULTED HIS CELLMATE, AND LATER ACCUSED PLAINTIFF OF TOUCHING HIS BUTTOCKS CAUSING DAMAGE TO PLAINTIFF'S REPUTATION BY SLANDER/LIBEL

(6) PATRICIA HORNER RAILROADED PLAINTIFF'S CIVIL COMPLAINT AND FAILED TO ADEQUATELY PERFORM THE DUTIES OF EFFECTIVE ASSISTANCE OF COUNSEL BY INTENTIONALLY DELAYING/PERFECTING SERVICE UPON ALL DEFENDANTS AND FAILING TO OBTAIN A COMPLETE COPY OF PLAINTIFF'S MEDICAL FILE FROM 1996 to 1999 FOR ODRC; 2000 to 2011. FEDERAL BUREAU OF OPRISONS ; AND 2011 to 2021 FOR ODRC



PLEASE WRITE AS BRIEFLY AS POSSIBLE THE FACTS OF YOUR CASE. DESCRIBE HOW EACH DEFENDANT IS INVOLVED. INCLUDE THE NAME OF ALL PERSONS INVOLVED. GIVE DATES AND PLACES.

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(7) GARY WYNN PETERSON DENIED PLAINTIFF TO GIVE TESTIMONY RELEVANT  
FOR BLAKE WILLIAMS UNPROVKED ASSAULT BY ODRC STAFF IN SPITE  
OF PLAINTIFF BEING SUBPOENED TO GIVE TESTIMONY FOR SAME

(8) T. DIEHL FAILED TO INVESTIGATE PLAINTIFF'S LOSS FOR COMMISSARY  
PURCHASED BUT NEVER RECEIVED, AND IMP~~E~~DED STEPS FOR  
REASONABLE ICR'S, GRIEVANCES, AND APPEALS OF SAME.

IN ADDITION, HE FALSIFIED DOCUMENTS RELATING TO PUBLIC RECORDS  
REQUEST.

(9) LORI PETERMAN COMMITTED LIBEL/SLANDER DAMAGING PLAINTIFF'S  
REPUTATION, PERSON, WHICH HAS PREVENTED HIM FROM REASONABLE  
CONSIDERATION FOR PAROLE RELEASE.

EACH DEFENDANT'S ACTIONS CONSTITUTE A VIOLATION OF OFFICIAL POLICY  
AND SUCH ACTIONS VIOLATED PLAINTIFF'S CONSTITUTIONAL RIGHTS.

RELIEF

IN THIS SECTION PLEASE STATE (WRITE) BRIEFLY EXACTLY WHAT YOU WANT THE COURT TO DO FOR YOU. MAKE NO LEGAL ARGUMENT, CITE NO CASES OR STATUTES.

(1) A DECLARATION THAT THE ACTS/OMISSIONS HEREIN VIOLATED

PLAINTIFF'S CONSTITUTIONAL RIGHTS UNDER OHIO AND UNITED

STATES CONSTITUTION

(2) A PRELIMINARY INJUNCTION AND TEMPORARY RESTRAINING ORDER

TO PREVENT DEFENDANTS FROM INTERFERING WITH PLAINTIFF'S

EQUAL PROTECTION, DUE PROCESS, AND RIGHT TO LIFE, LIBERTY,

AND FREEDOM, PROPERTY

(3) NOMINAL DAMAGES AUTHORIZED BY LAW AND DETERMINED BY A JURY

OF THIS COURT AGAINST EACH DEFENDANT

(4) PUNITIVE DAMAGES AGAINST EACH DEFENDANT DETERMINED BY A

JURY

(5) PLAINTIFF'S COST IN THIS ACTION

(6) APPOINTMENT OF COUNSEL

(7) ANY ADDITIONAL RELIEF THIS COURT DEEMS JUST AND PROPER AND

EQUITABLE.

SIGNED THIS 15 DAY OF NOVEMBER 2024

Brian Keith Alford A196-744  
SIGNATURE OF PLAINTIFF

BRIAN KEITH ALFORD A196-744